

EXHIBIT “A”

SUPREME COURT OF THE STATE OF NEW YORK
BRONX COUNTY

-----X
DEJA REALTY CORP,

Plaintiff,

-against-

THE TRAVELERS INDEMNITY COMPANY OF
AMERICA,

Defendant.
-----X

Index No.: _____
Filed: _____

Plaintiff designates
BRONX COUNTY as the
place of trial.

SUMMONS

The basis of venue is
Plaintiff's address.

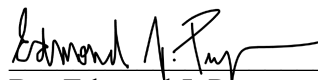
Plaintiff owns property at
2015 Vyse Avenue
Bronx, New York 10460

TO THE ABOVE NAMED DEFENDANT(S):

YOU ARE HEREBY SUMMONED to answer the complaint in this action and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance on the Plaintiff(s) Attorneys within 20 days after the service of this summons, exclusive of the day of service (or within 30 days after the service is complete if this summons is not personally delivered to you within the State of New York); and in case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

Dated: Bronx, New York
December 6, 2023

Yours, etc.,
LAW OFFICES OF EDMOND J. PRYOR



By: Edmond J. Pryor
Attorneys for Plaintiff
292 City Island Avenue
Bronx, New York 10464
718-829-0222
pryor@pryorlaw.com

DEFENDANT'S ADDRESS:

The Travelers Indemnity Company of America
c/o New York State Department of Financial Services
Office of General Counsel
One State Street
New York, NY 10004

**YOU SHOULD IMMEDIATELY BRING THESE DOCUMENTS TO YOUR
ATTORNEY**

SUPREME COURT OF THE STATE OF NEW YORK
BRONX COUNTY

-----X

DEJA REALTY CORP,

Index No.:

Plaintiff,

COMPLAINT

-against-

THE TRAVELERS INDEMNITY COMPANY OF
AMERICA,

Defendant.

-----X

Plaintiff, DEJA REALTY CORP, by its attorneys, the Law Offices of Edmond J. Pryor,
complaining of the Defendant, respectfully alleges as follows:

1. Plaintiff is a corporation duly organized and existing under and by the virtue of the laws of the State of New York with its primary place of business in Bronx County, New York.
2. Defendant, THE TRAVELERS INDEMNITY COMPANY OF AMERICA, is a foreign corporation authorized to do business in, under, and by virtue of the laws of the State of New York.
3. Defendant is an insurance company authorized to issue insurance policies in the State of New York.
4. Underlying the instant matter is an action entitled: “Deja Realty Corp. v. 2011 Vyse Realty LLC and Kiri Construction Corp.” which is pending in the Supreme Court, Bronx County under Index Number 816819/2021E (the “Underlying Action”). A true and accurate copy of the Complaint in the Underlying Action is attached hereto as **EXHIBIT 1**.
5. The Underlying Action alleges that Deja Realty Corp suffered damages to its building at 2015 Vyse Avenue, Bronx, New York due to the Underlying Action Defendants’ demolition and

construction at the neighboring property known as 2011 Vyse Avenue, Bronx, New York in and around late 2021.

6. Defendant issued a Businessowner's policy to the Plaintiff, bearing Policy No. 680-0R301533-23-42 (2023-2024 policy), for the period of May 8, 2021 to May 8, 2022.

7. Plaintiff paid to Defendant all premiums required to be paid under the policy so that it was in full force and effect for the period in and around late 2021.

As and For a First Cause of Action

8. Plaintiff incorporates by reference each of the allegations set forth in paragraphs 1 through 7 of this Complaint.

9. In or about September 2021, the Plaintiff became aware of the damage to its building caused by the excavation and hammering of rock at the adjacent parcel.

10. In or about September 2021, the Plaintiff notified the Defendant and/or its agents of the damage to its building and requested to file a claim under its policy.

11. The Plaintiff notified the Defendant and/or its agents of the damage within a reasonable period of their becoming aware of it.

12. The Plaintiff notified the Defendant and/or its agents of the damage as soon as practicable under the circumstances.

13. Defendant acknowledged receipt of the Plaintiff's notice of the alleged claim.

14. Defendant thereafter denied coverage and disclaimed any and all obligation under the Plaintiff's insurance policy to pay damages arising out of the damage caused to Plaintiff's property.

15. Defendant denied coverage and disclaimed any and all obligation under the Plaintiff's insurance policy to pay damages arising out of the damage caused to Plaintiff's property on various contradictory grounds.

16. Plaintiff has performed all of its obligations under the policy of insurance and has not been, and is not, in default in respect thereto.

17. Defendant is in breach of the policy of insurance entered into between Plaintiff and Defendant and Plaintiff therefore seeks a declaration that the Plaintiff is entitled to damages awarded arising out of damage caused to Plaintiff's property.

As and For a Second Cause of Action

18. Plaintiff incorporates by reference each of the allegations contained in paragraphs 1 through 17 of this Complaint.

19. As a result of Defendant's failure to compensate Plaintiff and exercise its subrogation rights against the neighbor that caused the damage, the Plaintiff, at its own expense, has employed an attorney and others to carry on an investigation, file a Summons and Complaint, and litigate its claims against 2011 Vyse Realty LLC and Kiri Construction Corp. to seek compensation for the damage caused to Plaintiff's real property.

WHEREFORE the Plaintiff respectfully prays that the court:

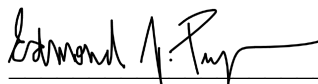
- a. Make a binding declaration of the rights, duties, status, and other legal relations of the Plaintiff and Defendant pursuant to the policy of insurance and the contractual obligations of the Defendant to Plaintiff;
- b. Declare that the Defendant is bound to compensate Plaintiff for the damage to its real property up to the limits of the policy of insurance;

- c. Declare that the Defendant is liable to Plaintiff to reimburse it for all amounts paid by it in prosecuting and investigating the damages caused by Plaintiff's neighbor; and
- d. Grant such other and further relief as it deems proper.

Dated: Bronx, New York
December 6, 2023

Yours, etc.,

LAW OFFICES OF EDMOND J. PRYOR



By: Edmond J. Pryor
Attorneys for Plaintiff
292 City Island Avenue
Bronx, N.Y. 10464
718-829-0222

EXHIBIT 1

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF BRONX

Index No: _____

Filed: _____

-----X

DEJA REALTY CORP.,

Plaintiff(s) designate(s)

BRONX County

as the place of trial

Plaintiff,

SUMMONS

-against-

2011 VYSE REALTY LLC and KIRI CONSTRUCTION
CORP.,

The basis for Venue is
Plaintiff's address.

Defendants.

Plaintiff owns property at:

2015 Vyse Avenue

Bronx, New York

-----X

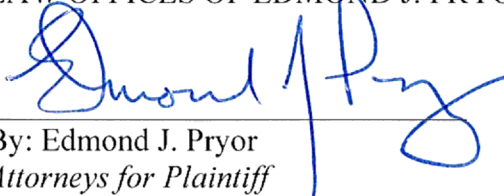
TO THE ABOVE NAMED DEFENDANT(S):

YOU ARE HEREBY SUMMONED to answer the complaint in this action and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance on the Plaintiff(s) Attorneys within 20 days after the service of this summons, exclusive of the day of service (or within 30 days after the service is complete if this summons is not personally delivered to you within the State of New York); and in case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

Dated: Bronx, New York
December 10, 2021

Yours, etc.,

LAW OFFICES OF EDMOND J. PRYOR



By: Edmond J. Pryor
Attorneys for Plaintiff
292 City Island Avenue
Bronx, New York 10464
718-829-0222

DEFENDANTS' ADDRESSES:

2011 Vyse Realty LLC
c/o Allstate Corporate Services Corp.
99 Washington Avenue, Suite 1008
Albany, New York 12260

Kiri Construction Corp.
750 McLean Avenue, 2nd Floor
Yonkers, New York 10704

**YOU SHOULD IMMEDIATELY BRING THESE DOCUMENTS TO YOUR
ATTORNEY**

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF BRONX

-----X
DEJA REALTY CORP.,

Index No. _____-2021E

Plaintiff,

VERIFIED COMPLAINT

-against-

2011 VYSE REALTY LLC and KIRI CONSTRUCTION
CORP.

Defendants.

-----X

Plaintiff DEJA REALTY CORP., by its attorneys, the LAW OFFICES OF EDMOND J.
PRYOR, as and for a Verified Complaint, alleges, as follows:

1. Plaintiff DEJA REALTY CORP. ("Plaintiff") is a corporation organized and existing under the laws of the State of New York and licensed to do business in New York.
2. Defendant 2011 VYSE REALTY LLC is a limited liability company organized and existing under the laws of the State of New York and licensed to do business in New York, with a principal place of business c/o Allstate Corporate Services Corp., 99 Washington Avenue, Suite 1008, Albany, New York 12260.
3. Defendant KIRI CONSTRUCTION CORP. is a corporation organized and existing under the laws of the State of New York, with a principal place of business at 750 McLean Avenue, 2nd Floor, Yonkers, New York 10704.
4. This action is brought pursuant to the common law of the State of New York.
5. Plaintiff owns the land and a 26 family apartment building located at 2015 Vyse Avenue, Bronx, New York and known as Block 3127, Lot 23. A true and correct copy of Plaintiff's deed is attached hereto as **EXHIBIT A**.

6. Defendants own, manage and/or control the property at 2011 Vyse Avenue, Bronx, New York, and known as Block 3127, Lot 25. A true and correct copy of Defendant 2011 Vyse Realty LLC's deed is attached hereto as **EXHIBIT B**.

7. Defendant 2011 Vyse Realty LLC's land, which is currently vacant, abuts and is immediately adjacent to Plaintiff's premises.

8. Upon information and belief, Defendants are seeking to construct a 6 story multi-family apartment building.

9. Defendants are currently excavating the property, which threatens the foundation, the entire wall that is on the property line adjacent to Defendants' property and the overall stability of Plaintiff's building. Further, the Defendants have inexplicably and shockingly installed a vibration monitoring system in the basement of Plaintiff's property without Plaintiff's permission or consent. Defendants have been regularly going on to Plaintiff's property without Plaintiff's permission or consent.

10. As a result of the Defendants' excavation work, which includes demolition of rock below grade, the Plaintiff's building is sustaining severe damages to its façade and the structural wall that is immediately adjacent to Defendants' property, placing the structural integrity of the Plaintiff's building at risk and, most importantly, putting the lives of approximately 100 residents at risk of being injured or, worse, dying. As of November 24, 2021, the Plaintiff's building has sustained more than \$450,000.00 in damages and, due to the Defendants' refusal to cease excavation and to take steps to ensure that Plaintiff's building is protected, the damages continue to increase.

11. As a result of Defendants' gross misconduct, the structural integrity of Plaintiff's building has been compromised, the lives of the residents are endangered, and Plaintiff has been caused to suffer great financial loss.

FIRST CAUSE OF ACTION

Trespass

12. Plaintiff hereby incorporates by reference all previous allegations.

13. Defendants conduct in excavating their property without the proper safeguards in place to protect the structural integrity of the building adjacent to it and entering the Plaintiff's building unlawfully and without permission or consent has interfered with Plaintiff's right to possession of its premises.

14. Defendants' unlawful conduct has caused damage to Plaintiff's property and endangers the lives of the individuals residing therein.

15. Accordingly, Plaintiff is entitled to damages, including costs and fees, in an amount to be determined at trial.

SECOND CAUSE OF ACTION

Private Nuisance

16. Plaintiff hereby incorporates by reference all previous allegations.

17. Defendants' conduct is intentional and substantial in nature.

18. Defendants' conduct is unreasonable in character.

19. Defendants' actions, and failure to act to protect the structural integrity of Plaintiff's building, have interfered with Plaintiff's right to use and enjoy the land and endangers the lives of the individuals residing therein.

20. By reason of the Defendants' conduct, Plaintiff is entitled to damages, including costs and fees, in an amount to be determined at trial.

**THIRD CAUSE OF ACTION AGAINST
Preliminary and Permanent Injunction**

21. Plaintiff hereby incorporates by reference all previous allegations.

22. Defendants are encroaching and interfering with Plaintiff's use and enjoyment of its premises and is endangering the lives of the individuals residing at Plaintiff's property.

23. Defendant's actions are causing irreparable harm to Plaintiff, leaving any judgment in favor of Plaintiff ineffectual.

24. Plaintiff is, therefore, entitled to preliminary and permanent injunctions enjoining and restraining Defendants, and all those acting in concert with them or on their behalf, from taking any steps or actions to interfere with Plaintiff's use of the premises.

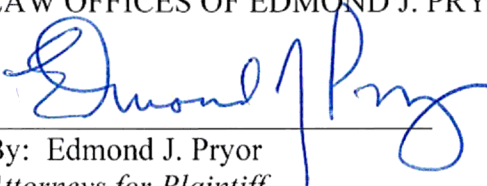
WHEREFORE, plaintiff demands judgment against the defendants as follows:

- a. On its First Cause of Action, finding that Defendants' conduct constitutes a private nuisance and awarding damages to Plaintiff;
- b. On its Second Cause of Action, for judgment finding that Defendants have trespassed on Plaintiff's property and awarding damages to Plaintiff;
- c. On its Third Cause of Action, preliminarily and permanently enjoining Defendants from further interference with Plaintiff's premises; and
- d. For such other and further relief as this Court deems just and proper.

Dated: Bronx, New York
December 10, 2021

Yours, etc.,

LAW OFFICES OF EDMOND J. PRYOR



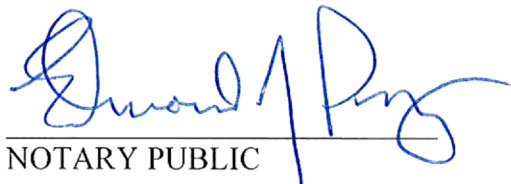
By: Edmond J. Pryor
Attorneys for Plaintiff
292 City Island Avenue
Bronx, N.Y. 10464
ph: 718-829-0222
fx: 718-829-0032

VERIFICATION


STATE OF NEW YORK }
 }ss.:
COUNTY OF BRONX }

I, EDUART SHLLAKU, being duly sworn, deposes and says that I am the vice president of the plaintiff in this action; I have read the foregoing COMPLAINT, know the contents thereof; and the same is true to my own knowledge, except as to those matters therein which are stated to be alleged on information and belief, and as to those matters I believe them to be true.

Sworn to before me on
December 10, 2021



NOTARY PUBLIC



EDUART SHLLAKU

EDMOND J. PRYOR
Notary Public, State of New York
Reg. No. 02PR4993399
Qualified in Bronx County
Commission Expires March 16, 2022

EXHIBIT A

CONSULT YOUR LAWYER BEFORE SIGNING THIS INSTRUMENT-THIS INSTRUMENT SHOULD BE USED BY LAWYERS ONLY

THIS INDENTURE, made the 18TH day of MARCH, 2016

BETWEEN

JACINTO CASTRO, HAVING AN ADDRESS AT
2015 VYSE AVENUE, BRONX, NEW YORK 10460

party of the first part, and

DEJA REALTY CORP., DOING BUSINESS AT
781 VAN NEST AVENUE, BRONX, NEW YORK 10462

party of the second part,

WITNESSETH, that the party of the first part, in consideration of

_____TEN (\$10.00)_____ dollars
paid by the party of the second part, does hereby grant and release unto the party of the second part, the heirs
or successors and assigns of the party of the second part forever,

ALL that certain plot, piece or parcel of land, with the buildings and improvements thereon erected, situate,
lying and being in the

PREMISES KNOWN AS 2015 VYSE AVENUE,
BRONX, NEW YORK 10460

BLOCK: 3127 LOT: 23

SEE SCHEDULE A HERETO ANNEXED AND MADE PART HEREOF

TOGETHER with all right, title and interest, if any, of the party of the first part in and to any streets and roads
abutting the above described premises to the center lines thereof; TOGETHER with the appurtenances and all
the estate and rights of the party of the first part in and to said premises; TO HAVE AND TO HOLD the
premises herein granted unto the party of the second part, the heirs or successors and assigns of the party of
the second part forever.

AND the party of the first part covenants that the party of the first part has not done or suffered anything
whereby the said premises have been encumbered in any way whatever, except as aforesaid.

AND the party of the first part, in compliance with Section 13 of the Lien Law, covenants that the party of the
first part will receive the consideration for this conveyance and will hold the right to receive such consideration
as a trust fund to be applied first for the purpose of paying the cost of the improvement and will apply the same
first to the payment of the cost of the improvement before using any part of the total of the same for any other
purpose. The word "party" shall be construed as if it read "parties" when ever the sense of this indenture so
requires.

IN WITNESS WHEREOF, the party of the first part has duly executed this deed the day and year first above
written.

IN PRESENCE OF:



JACINTO CASTRO


ACKNOWLEDGEMENT TAKEN IN NEW YORK STATE

State of New York, County of **BRONX**, ss:

On the **18TH** day of **MARCH** in the year **2016**,
before me, the undersigned, personally appeared

JACINTO CASTRO

personally known to me or proved to me on the basis of satisfactory evidence to be the individual(s) whose name(s) is (are) subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their capacity(ies), and that by his/her/their signature(s) on the instrument, the individual(s), or the person upon behalf of which the individual(s) acted, executed the instrument.


BARBARA E. SUFIAN
Notary Public, State of New York
No. 01804912633
Qualified in Westchester County
Commission Expires April 11, 2018

ACKNOWLEDGEMENT BY SUBSCRIBING WITNESS TAKEN
IN NEW YORK STATE

State of New York, County of _____, ss:

On the _____ day of _____ in the year _____,
before me, the undersigned, a Notary Public in and for said State,
personally appeared _____
the subscribing witness to the foregoing instrument, with whom I am
personally acquainted, who, being by me duly sworn, did depose and say
that he/she/they reside(s) in _____

(if the place of residence is in a city, include the street and street number if any, thereof);
that he/she/they know(s) _____

to be the individual described in and who executed the foregoing
instrument; that said subscribing witness was present and saw said

execute the same; and that said witness at the same time subscribed
his/her/their name(s) as a witness thereto

ACKNOWLEDGEMENT TAKEN IN NEW YORK STATE

State of New York, County of _____, ss:

On the _____ day of _____ in the year _____,
before me, the undersigned, personally appeared _____

personally known to me or proved to me on the basis of satisfactory evidence to be the individual(s) whose name(s) is (are) subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their capacity(ies), and that by his/her/their signature(s) on the instrument, the individual(s), or the person upon behalf of which the individual(s) acted, executed the instrument.

ACKNOWLEDGEMENT TAKEN OUTSIDE NEW YORK
STATE

*State of _____, County of _____, ss:

*(Or insert District of Columbia, Territory, Possession or Foreign County)

On the _____ day of **MARCH** in the year **2016**,
before me, the undersigned personally appeared _____

Personally known to me or proved to me on the basis of satisfactory evidence to be the individual(s) whose name(s) is (are) subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their capacity(ies), that by his/her/their signature(s) on the instrument, the individual(s) or the person upon behalf of which the individual(s) acted, executed the instrument, and that such individual make such appearance before the undersigned in the _____

(add the city or political subdivision and the state or country or other
place the acknowledgement was taken).

**Bargain and Sale Deed
With Covenants**

Title No. **121144 FI-B**

JACINTO CASTRO

TO

DEJA REALTY CORP.

SECTION:

BLOCK: **3127**

LOT: **23**

COUNTY OR TOWN: **BRONX**

RETURN BY MAIL TO:

THE JUDICIAL TITLE INSURANCE AGENCY LLC
800 WESTCHESTER AVENUE SUITE S-340
RYE BROOK, NY 10573
914-381-6700

EDMUND J. PRYOR, ESQ
292 CITY ISLAND AVENUE
BRONX, NEW YORK 10464

THE JUDICIAL TITLE INSURANCE AGENCY LLC**Title Number: 121144FI-B****SCHEDULE A**

ALL that certain plot, piece or parcel of land, situate, lying and being in the Borough and County of the Bronx, City and State of New York, bounded and described as follows:

BEGINNING at a point on the westerly side of Vyse Avenue, distant 64.88 feet southerly from the corner formed by the intersection of the said westerly side of Vyse Avenue and the southerly side of East 179th Street, as said Avenue and Street are legally opened;

RUNNING THENCE westerly along the a line forming an interior angle of 90 degrees 58 minutes 28 seconds with the last mentioned course, 142.15 feet;

THENCE southerly along a lone forming an interior angle of 89 degrees 28 minutes 24 seconds with the last mentioned course of 25.01 feet;

THENCE easterly along a line forming an interior angle of 90 degrees 31 minutes 36 seconds with the last mentioned course, 141.92 feet the westerly side of Vyse Avenue;

THENCE northerly along the westerly side of Vyse Avenue, 25 feet to the point or place of BEGINNING.

**FOR
CONVEYANCING
ONLY**

The policy to be issued under this report will insure the title to such buildings and improvements erected on the premises which by law constitute real property.

TOGETHER with all the right, title and interest of the party in the first part, or, in and to the land lying in the street in front of and adjoining said premises.

EXHIBIT B

Form 8002 (3/00) - Bargain and Sale Deed, with Covenants against Grantor's Acts - Individual or Corporation. (Single sheet)
CONSULT YOUR LAWYER BEFORE SIGNING THIS INSTRUMENT - THIS INSTRUMENT SHOULD BE USED BY LAWYERS ONLY.

THIS INDENTURE, made the 21st day of AUGUST, 2020 and
BETWEEN

2011 VYSE PARTNERS LLC, having an address at 7025 Yellowstone Boulevard, #10P, Forest Hills, NY
11375

party of the first part, and

2011 VYSE REALTY LLC, having an address at 45-61 196th Street, Flushing, NY 11358

party of the second part.

WITNESSETH, that the party of the first part, in consideration of ten dollars and other valuable consideration paid by the party of the second part, does hereby grant and release unto the party of the second part, the heirs or successors and assigns of the party of the second part forever.

ALL that certain plot, piece or parcel of land, with the buildings and improvements thereon erected, situate, lying and being in the

See Attached Schedule A.

Being the same premises conveyed to the Grantor(s) herein by deed dated 04/12/2017 recorded 04/18/2017 in CRFN
2017000149582 in the New York City Register's office, Bronx County.

Premises known as: 2011 Vyse Avenue, Bronx, New York (B: 3127; L: 25)

TOGETHER with all right, title and interest, if any, of the party of the first part, in and to any streets and roads abutting the above-described premises to the center lines thereof; TOGETHER with the appurtenances and all the estate and rights of the party of the first part in and to said premises; TO HAVE AND TO HOLD the premises herein granted unto the party of the second part, the heirs or successors and assigns of the party of the second part forever.

AND the party of the first part covenants that the party of the first part has not done or suffered anything whereby the said premises have been encumbered in any way whatever, except as aforesaid.

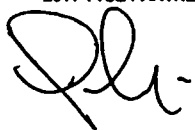
AND the party of the first part, in compliance with Section 13 of the Lien Law, covenants that the party first part will receive the consideration for this conveyance and will hold the right to receive such consideration as a trust fund to be applied first for the purpose of paying the cost of the improvement and will apply the same first to the payment of the cost of the improvement before using any part of the total of the same for any other purpose.

The word "party" shall be construed as if it read "parties" whenever the sense of this indenture so requires.

IN WITNESS WHEREOF, the party of the first part has duly executed this deed the day and year first above written.

IN PRESENCE OF:

2011 VYSE PARTNERS LLC



Schedule A DescriptionTitle Number **GNA7280BX**

Page 1

ALL that certain plot, piece or parcel of land, situate, lying and being in the Borough and County of Bronx, City and State of New York, being bounded and described as follows:

BEGINNING at a point on the westerly side of Vyse Avenue as legally opened, distant 120.74 feet northerly to a corner formed by the intersection of the said westerly side of Vyse Avenue with the northerly side of East 178th Street;

RUNNING THENCE westerly along a line on its southerly side of angle of 89 degrees 44 minutes with the westerly side of Vyse Avenue, 142.36 feet to lands now or formerly of Daniel Mapes;

THENCE northerly along said land now or formerly of Mapes, 27.58 feet, more or less, to the southerly line of Lot Number 26 on a map entitled "Map of Lands of Thomas Walker, late of West Farms dated July 2nd, 1849 made by Andrew Findlay, Surveyor, and filed in the Office of the Register of Westchester County, May 1st, 1851 as Map No. 160;

THENCE easterly along the southerly line of Lot No. 26, 142.12 feet to the westerly side of Vyse Avenue; and

THENCE southerly along the westerly side of Vyse Avenue, 25 feet to the point or place of BEGINNING.

Block: 3127 Lot: 25

Acknowledgement taken in New York State

State of New York, County of

, ss:

On the 19th day of AUGUST, in the year 2020, before me,
the undersigned, personally appeared

John Yu

personally known to me or proved to me on the basis of
satisfactory evidence to be the individual(s) whose name(s) is
(are) subscribed to the within instrument and acknowledged to
me that he/she/they executed the same in his/her/their
capacity(ies), and that by his/her/their signature(s) on the
instrument, the individual(s) or the person upon behalf of which
the individual(s) acted, executed the instrument.

ALIYA H STIRPE
Notary Public - State of New York
NO. 01ST6168756
Qualified in Queens County
My Commission Expires Jun 18, 2023

Acknowledgement by Subscribing Witness taken in New York State

State of New York, County of QUEEN

, ss:

On the 19 day of AUG, in the year 2020, before me,
the undersigned, personally appeared

JOHN YU

the subscribing witness to the foregoing instrument, with whom I
am personally acquainted, who being by me duly sworn, did
depone and say, that he/she/they reside(s) in

that he/she/they know(s)
to be the individual described in and who executed the
foregoing instrument; that said subscribing witness was
present and saw said
execute the same; and that said witness at the same time
subscribed his/her/their name(s) as a witness thereto.

ALIYA H STIRPE
Notary Public - State of New York
NO. 01ST6168756
Qualified in Queens County
My Commission Expires Jun 18, 2023

Title No.: GNA7280BX

2011 VYSE PARTNERS LLC

[Signature]
TO

2011 VYSE REALTY LLC

Distributed by
Chicago Title Insurance Company

Acknowledgement taken in New York State

State of New York, County of

, ss:

On the _____ day of _____, in the year _____, before me,
the undersigned, personally appeared

personally known to me or proved to me on the basis of
satisfactory evidence to be the individual(s) whose name(s) is
(are) subscribed to the within instrument and acknowledged to
me that he/she/they executed the same in his/her/their
capacity(ies), and that by his/her/their signature(s) on the
instrument, the individual(s) or the person upon behalf of which
the individual(s) acted, executed the instrument.

Acknowledgement taken outside New York State

*State of _____, County of _____, ss:
*(or insert District of Columbia, Territory, Possession or
Foreign Country)

On the _____ day of _____, in the year _____, before me,
the undersigned, personally appeared

personally known to me or proved to me on the basis of
satisfactory evidence to be the individual(s) whose name(s) is
(are) subscribed to the within instrument and acknowledged to me
that he/she/they executed the same in his/her/their capacity(ies),
and that by his/her/their signature(s) on the instrument, the
individual(s) or the person upon behalf of which the individual(s)
acted, executed the instrument, and that such individual made
such appearance before the undersigned in the

(add the city or political subdivision and the state or country or
other place the acknowledgement was taken).

DISTRICT

SECTION

BLOCK 3127

LOT 25

COUNTY OR TOWN Bronx County

RETURN BY MAIL TO:

Philip Bornstein, Esq.
48-02A Broadway
Astoria, NY 11103

Zip No.

RESERVE THIS SPACE FOR USE OF RECORDING OFFICE

AFFIDAVIT OF MAILING

14.8 *

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF BRONX

Index #: 819483/2023E

Court Date: _____

Date Filed: December 6, 2023

File No.: _____

ATTORNEY(S) LAW OFFICES OF EDMOND J. PRYOR PH: (718) 829-0222
BRONX, NY 10464

DEJA REALTY CORP

Plaintiff

vs.

THE TRAVELERS COMPANY OF AMERICA

Defendant

STATE OF NEW YORK, COUNTY OF NEW YORK SS.:

CHRISTOPHER J. KLEIN, being duly sworn deposes and says: Deponent is not a party herein, is over 18 years of age and resides in the State of New York.

On 12/12/2023, deponent completed service by placing a copy of the

Summons and Complaint with Notice of Commencement of Action Subject to Mandatory Electronic Filing

in a 1st Class postpaid properly addressed envelope marked "Personal and Confidential" which was deposited in an official depository under the exclusive care and custody of the United States Post Office in the State of New York,

addressed to TRAVELERS INDEMNITY COMPANY OF AMERICA S/H/A THE TRAVELERS COMPANY OF AMERICA
C/O THE DEPARTMENT OF FINANCIAL SERVICES

The index number and the filing date of the action were endorsed upon the face of the papers so served herein.

at ATTN: CORP AFFAIRS UNIT, 1 COMMERCE PLAZA, 20TH FL., ALBANY, NY 12260

X This mail was also sent by Certified/Registered Mail and/or RRR receipt no.

9414836105442884304415

Sworn to before me on December 12, 2023

Joseph Knight
Notary Public - State of New York
No. 01KN6178241
Qualified in New York County
My Commission Expires 11/26/27



CHRISTOPHER J. KLEIN

Server's Lic # 1188546

Job# 2369636

Cust.File #

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORKSTATEMENT OF AUTHORIZATION FOR
ELECTRONIC FILING

(Single Attorney for Firm Employee or Independent Filing Agent)

I, Edmond J. Pryor, Esq., (Attorney Registration No. # 2310605) am an authorized user of the NYSCEF system (user ID: _____). I hereby acknowledge that _____ ("the filing agent") has registered as a filing agent authorized user of the NYSCEF system (user ID: _____). Further I hereby authorize the filing agent to file documents on my behalf and at my direction in any e-filed matter in which I am counsel of record through the New York State Courts Electronic Filing System, as provided in Section 202.5-b(d)(1) of the Uniform Rules for the Trial Courts.

This authorization extends to any matter in which I have previously consented to e-filing and to any matter in which I may authorize the filing agent to record my consent in the NYSCEF system.

This filing authorization extends to any and all documents I generate and submit to the filing agent for filing in any such matter. This authorization, posted once on the NYSCEF website as to each matter in which I am counsel of record, shall be deemed to accompany any document filed in that matter by the filing agent.

Where a document intended for filing includes secure information as set forth in the E-Filing Rules, I will notify the filing agent and direct the filing agent to mark that document Secure in the NYSCEF system.

I further authorize the filing agent to view such Secure documents that I have filed or that I generate and submit to the filing agent for filing in any such matter.

This authorization regarding this filing agent shall continue until I revoke it in writing on a prescribed form delivered to the E-Filing Resource Center.

Signature

Edmond J. Pryor

Print Name

Edmond J. Pryor, Esq.

Firm/Department

718-829-0222

Phone

Dated

12/5/19
292 City Island Ave

Street Address

Bronx, New York 10464

City, State and Zip Code

Pryor@Pryorlaw.com

E-Mail Address



**Department of
Financial Services**

KATHY HOCHUL
Governor

ADRIENNE A. HARRIS
Superintendent

STATE OF NEW YORK
Supreme Court, County Of Bronx

819483/2023E

Deja Realty Corp.

Plaintiff(s)

against

Defendant(s)

Travelers Indemnity Company of America(Standard National
Insurance Company)

RE :Travelers Indemnity Company of America(Standard National Insurance Company)

Attorney for Plaintiff(s) and Defendant(s) please take notice as follows:

Attorney for Plaintiff(s) is hereby advised of acknowledgement of service upon this Department
Summons and Complaint in the above entitled action on December 19, 2023 at Albany, New York. The
\$40.00 fee is also acknowledged.

Original to Attorney for Plaintiff(s):

Law Offices of Edmond J. Pryor
Edmond J. Pryor
292 City Island Avenue
Bronx, New York 10464

Pursuant to the requirement of section 1212 of the Insurance Law, Defendant(s) is hereby notified of
service as effected above. A copy of the paper is enclosed.

Duplicate to Defendant:

Corporation Service Company
Travelers Indemnity Company of America(Standard National Insurance Company)
80 State Street
Albany, New York 12207-2543

A black and white photograph of a handwritten signature, likely of Rawle Lewis, over a textured background.

Rawle Lewis
Director of Producer Licensing

Dated Albany, New York, December 26, 2023
729633 alic0tgw